

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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JANE DOE, LUKE LOE, RICHARD ROE, and MARY :  
MOE, individually and on behalf of all others similarly :  
situated, :

*Plaintiffs,* :

v. :

THE TRUMP CORPORATION, DONALD J. TRUMP, in :  
his personal capacity, DONALD TRUMP JR., ERIC :  
TRUMP, and IVANKA TRUMP, :

*Defendants.* :

No. 1:18-cv-09936 (LGS)

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**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law,  
Defendants The Trump Corporation, Donald J. Trump, in his personal capacity, Donald Trump  
Jr., Eric Trump, and Ivanka Trump will move this Court, before the Honorable Lorna G.  
Schofield, United States District Judge for the Southern District of New York, on a date and time  
to be set by the Court, for an order staying the action and ordering Plaintiffs to submit their  
dispute with Defendants to individual arbitration. The bases for the motion are set forth in the  
accompanying Memorandum of Law.

Dated: September 17, 2019  
New York, New York

Respectfully submitted,

SPEARS & IMES LLP

/s/ Joanna C. Hendon

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Corporation, Donald J. Trump, in his  
personal capacity, Donald Trump, Jr., Eric  
Trump, and Ivanka Trump*